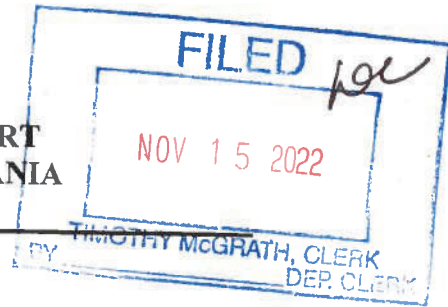


IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA



IN RE: :
Pauline Jones-Bibbs : Chapter 13
: No.: 22-12594-AMC
Debtor(s) :

RESPONSE TO OBJECTION TO DEBTOR RECEIVING DISCHARGE
FILED BY ENOCH JEROME

Debtor, Pauline Jones-Bibbs, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Enoch Jerome, hereby submits the following:

1. The Objection fails to identify the basis for the relief sought as required under L.B.R. 9014-2
2. The Objection fails and continues to fail to state with particularity the statutory provisions and factual circumstances, as required under 11 U.S.C. § 1328, that shall prevent the debtor from obtaining a discharge.

WHEREFORE, based on the aforementioned, Debtor respectfully requests that the Objection of Enoch Jerome be DENIED and WITHDRAWN.

Respectfully submitted,

Dated: October 24, 2022

/s/ Brad J. Sadek, Esq.

*TODAY IS OCTOBER 28-
2022: PAULINE JONES
MUST PAY ME ALL MONIES
SHE OWES ME!!!
FROM: ENOCH JEROME!!!*

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1500 JFK Boulevard Suite #220
Philadelphia, PA 19102
(215) 545-0008

CERTIFICATE OF SERVICE

I Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Objection to Debtor Receiving Discharge by electronic or Regular U.S. Mail on all creditors and the following parties:

Kenneth E. West, Esq.
Chapter 13 Trustee

Enoch Jerome
Filed Objection
Regular Mail to 1423 W. Erie Avenue Philadelphia, PA 19140

Dated: October 24, 2022

/s/ Brad J. Sadek, Esq.

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1500 JFK Boulevard Suite #220
Philadelphia, PA 19102
(215) 545-0008

TODAY IS: OCTOBER 28-
2022: PAULINE JONES
MUST PAY ME ALL
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PHILADELPHIA MUNICIPAL COURT
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA

1339 Chestnut Street, 10th Floor, Philadelphia, PA 19107

Marsha H. Neifield, President Judge Patricia R. McDermott, Deputy Court Administrator

SMALL CLAIMS COMPLAINT

SC-14-08-04-3281

ENOCH JEROME 1423 W. ERIE AVE PHILADELPHIA, PA 19140	PAULINE BROWN AKA/DBA: PAULINE JONES 1525 FITZWATER STREET APT. 606 PHILADELPHIA, PA 19146
Plaintiff(s)	Defendant(s)

JUDGMENT BY AGREEMENT

(The Agreement below will be entered as an Order of the Court)

BOTH OR ALL PARTIES AGREE TO THE FOLLOWING:

- ☒ Money Judgment for the amount of: 2900 Plus Costs: 100 For a Total of: 3000.00
- ☐ Case Settled, Discontinued and Ended
- ☐ Withdrawn Without Prejudice

Remarks:

MS. JONES AGREES TO PAY \$30 ON THE 15TH OF EACH MONTH BY MONEY ORDER STARTING 10/15/2014. SHOULD SHE RECEIVE ANY PAYMENT FROM THE SHERIFF, MS. JONES WILL PAY THE BALANCE OF THE JUDGMENT. ORDER TO SATISFY HAS BEEN EXPLAINED.

Order to Satisfy issued and explained

I am in accord with the above agreement and understand that with my signature I am waiving my right to appeal this case.

Plaintiff's Signature: <i>Enoch Jerome</i>	Defendant's Signature: <i>Pauline Brown</i>
Plaintiff's Telephone Number: 417-296-0543	Defendant's Telephone Number: 215-800-3057
Plaintiff's Attorney:	Defendant's Attorney:
Plaintiff's Attorney's I.D. & Telephone Number:	Defendant's Attorney's I.D. & Telephone Number:
Mediator--Signature: M. K. <i>[Signature]</i>	Mediator--Print Name: MORGAN KROUSE



THE MUNICIPAL COURT COMPLIES WITH THE AMERICANS WITH DISABILITIES ACT, WHICH REQUIRES THAT ALL COURT SERVICES AND FACILITIES BE ACCESSIBLE TO PERSONS WITH DISABILITIES ON AN EQUAL BASIS TO THOSE WITHOUT DISABILITIES. IF YOU HAVE A DISABILITY, AND REQUIRE REASONABLE ACCOMMODATIONS TO FILE A CLAIM, PARTICIPATE IN A MUNICIPAL COURT PROCEEDING, OR USE ANY SERVICE PROVIDED BY THE COURT, PLEASE CALL 686-7986. REQUESTS FOR REASONABLE ACCOMMODATIONS MUST BE MADE AT LEAST THREE BUSINESS DAYS BEFORE ANY HEARING, OR WITHIN THREE BUSINESS DAYS AFTER SERVICE (DELIVERY) OF THE NOTICE OF THE HEARING WHICHEVER IS LATER.



PHILADELPHIA MUNICIPAL COURT
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA

1339 Chestnut Street, 10th Floor, Philadelphia, PA 19107

Patrick F. Dugan, President Judge John J. Joyce, Deputy Court Administrator

SMALL CLAIMS COMPLAINT

SC-22-02-02-3114

ENOCH JEROME 1423 W ERIE AVE PHILADELPHIA, PA 19140	PAULINE JONES 2623 N 34TH ST PHILADELPHIA, PA 19132
Plaintiff(s)	Defendant(s)

JUDGMENT BY AGREEMENT

(The Agreement below will be entered as an Order of the Court)

BOTH OR ALL PARTIES AGREE TO THE FOLLOWING:

☒ Money Judgment for the amount of: 4372.70 Plus Costs: 116.75 For a Total of: 4489.45

☐ Case Settled, Discontinued and Ended

☐ Withdrawn Without Prejudice

Remarks:

Defendant agrees to the following;

1. Defendant agrees to pay \$75.00 per month beginning 07/07/2022 and every month by the 7th of each month until judgement amount is paid in full.
2. Defendant also agrees to mail check or money order payment to plaintiff home @ 1423 WEST ERIE AVENUE, PHILADELPHIA PA, 19140.
3. The order to satisfy has been explained.

Order to Satisfy issued and explained

I am in accord with the above agreement and understand that with my signature I am waiving my right to appeal this case.

Plaintiff's Signature: <i>Enoch Jerome</i>	Defendant's Signature: <i>Pauline Jones</i>
Plaintiff's Telephone Number:	Defendant's Telephone Number:
Plaintiff's Attorney:	Defendant's Attorney:
Plaintiff's Attorney's I.D. & Telephone Number:	Defendant's Attorney's I.D. & Telephone Number:
Mediator--Signature: NW <i>Coleman</i>	Mediator--Print Name: COURT APPOINTED MEDIATORS



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